

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 2-15				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-W-10-002			Contract Period   11/19/2009   To   11/18/2014 Base                      Option Period Number       2			Title of Work Assignment/SF Site Name Outc. Eval. Haz Waste Det. Reg				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW Pg. 10-11, Element III, Sec. I, Para 1					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   11/19/2011   To   05/15/2012				
Comments: The purpose of this action is to initiate Work Assignment 2-15. This work assignment continues the work not completed on Work Assignment 1-15.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO <input type="checkbox"/> (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:			LOE:					
11/19/2009   To   11/18/2014										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:			LOE:			
Cumulative Approved:				Cost/Fee:			LOE:			
Work Assignment Manager Name   Terell Lasane							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number   202-566-0705			
							FAX Number:			
Project Officer Name   Cathy Turner							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 202-566-0951			
							FAX Number:			
Other Agency Official Name							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number:			
							FAX Number:			
Contracting Official Name   Jami Rodgers							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 202-564-4781			
							FAX Number:			

## **Work Assignment Statement of Work**

**Title:** Outcome Evaluation of the Hazardous Waste Determination Regulations

**Contractor:** IEc, Inc.

**Contract No.:** EP-W-10-002

**Work Assignment Number:** 2-15

**Estimated Period of Performance:** Date of issuance to May 15, 2012

**Estimated Level of Effort:** 460 hours

**Key EPA Personnel:**

**Work Assignment COR (WA COR):**

**Terrell P. Lasane**

Evaluation Support Division (1807T)

(202) 566-0705

(202) 566-2300

**Alternate (WA COR):**

**Scott Bowles**

Evaluation Support Division (1807T)

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**Contract Level COR:**

Cathy Turner

CMG/OPEI (1805T)

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### **BACKGROUND AND PURPOSE:**

Located within the National Center for Environmental Innovation is the Evaluation Support Division (ESD). ESD's mission is two-fold: First, ESD assesses and evaluates innovative activities in ways that identify and explain successful innovations or lessons learned and communicates its findings throughout the Agency to promote system change. Second, ESD builds the capacity of EPA staff and managers to conduct program evaluation activities throughout the Agency by providing technical support and training on program evaluation for EPA's national programs and regional offices. A crucial component in assessing the benefit of meeting goals, objectives, and sub-objectives is having measurable results.

As part of its effort to encourage the effective use of program evaluations throughout the Agency, ESD promotes program evaluation through a Program Evaluation Competition. This

competition is part of an ongoing, long-term effort to help build the capacity of headquarters and regional offices to evaluate activities and to improve measures of program performance. This program evaluation project was chosen for support under the 2010 Program Evaluation Competition sponsored by OPEI.

## **Outcome Evaluation of the Hazardous Waste Determination Regulations**

Under the Resource Conservation and Recovery Act (RCRA), persons or companies who produce any kind of waste, called generators, are the first critical link in ensuring safe management of *hazardous waste*. Generators are required to determine whether any waste they produce is hazardous (e.g., toxic, ignitable, corrosive). If a waste is hazardous, the generator must manage the waste under the full RCRA cradle-to-grave hazardous waste management regulations including requirements for tracking, recordkeeping, safe storage, safe transportation, safe treatment, and safe final disposal. The RCRA hazardous waste regulations are designed to prevent serious environmental damages which can, and have occurred from improper management of hazardous waste. If a generator fails to identify a hazardous waste as hazardous, he or she will not start the waste down the hazardous waste management path. Thus, the critical gateway to the RCRA safe management system will be missed. A review of RCRA compliance data for 2008 and 2009 reveals that hazardous waste generators have twice as many violations associated with their hazardous waste determination process than any other RCRA generator violation. A more in-depth outcome program evaluation is needed to ascertain the underlying causes of these violations.

### **KEY QUESTIONS:**

- 1) What aspects about a facility influence compliance with the hazardous waste determination regulations? (e.g., organizational culture & structure)
- 2) What obstacles or challenges influence generators in complying with the hazardous waste determination regulations? (e.g., vague regulations & potential for varying interpretations of regulations)
- 3) What role does the state play in influencing generator behavior in complying with the hazardous waste determination regulations? (e.g., technical assistance programs, number of facility inspections, and guidance)
- 4) What are the best solutions or changes to make our national program more successful?
  - a) Are our regulations and guidance sufficiently clear in order for generators to properly determine if their wastes are hazardous?
  - b) Is our technical assistance program effective in helping generators make the hazardous waste determination correctly?
  - c) In what ways can we better help the states implement the hazardous waste determination program?

**Purpose:** This outcome evaluation is designed to evaluate the effectiveness of the hazardous waste determination regulations. Specifically, the evaluation will determine where the federal and state regulations are working and how OSWER can improve them, and will also identify potential problems experienced by the generators and areas where the program can assist the

generators in achieving compliance. Finally, the evaluation results will help improve the program's approach, methods, and activities to ensure compliance by generators as they make hazardous waste determinations.

### **Quality Assurance (QA) Requirements**

Check [ ] Yes or [ X ] NO, if the following statement is true or false. The Contractor shall submit a written Quality Assurance Project Plan for any project that is developing environmental measurements or a Quality Assurance Supplement to the Quality Management Plan for any project which generates environmental data using models with their technical proposal.

Work Assignment CORs will provide additional information here, if **Yes** is checked above.

The contractor shall prepare a quality assurance plan (QAP) that shall describe the use of primary and or secondary data sources for the evaluation report. Task 2-6 provides QAP requirements for this work assignment.

### **TASKS AND DELIVERABLES:**

The WA COR will review all deliverables in draft form and provide revisions and/or comments to the contractor. The contractor shall prepare the final deliverables incorporating the WA COR's comments.

Contractor personnel shall at all times identify themselves as Contractor employees and shall not present themselves as EPA employees. Furthermore, they shall not represent the views of the U.S. Government, EPA, or its employees. In addition, the Contractor shall not engage in inherently governmental activities, including but not limited to actual determination of EPA policy and preparation of documents on EPA letterhead.

The tasks in this work assignment will be completed in two phases. Tasks in Phase 1 will be completed by November 18, 2010. Tasks in Phase 2 will be completed after November 19, 2010. This work assignment continues work performed in Work Assignments 0-15, and Work Assignment 1-15 of this contract. The contractor shall not duplicate work previously performed in these work assignments.

### **Phase 1**

#### **TASK 1:                                      PREPARE WORKPLAN - COMPLETED**

The contractor shall prepare a workplan within 15 calendar days of receipt of a work assignment signed by the Contracting Officer. The workplan shall outline, describe and include the technical approach, resources, timeline and due dates for deliverables, a detailed cost estimate by task and

a staffing plan. The WA COR and the Contract Level COR and the CO will review the workplan. However, only the CO can approve/disapprove the workplan. The contractor shall prepare a revised workplan incorporating the Contracting Officer's comments, if required.

### **Deliverables and Schedule Under Task 1**

- |                      |  |
|----------------------|--|
| 1a. Workplan         | Within 15 calendar days of receipt of work assignment.                     |
| 1b. Revised workplan | Within ____ calendar days of receipt of comments from the CO, if required. |

### **NOTE REGARDING WORK ASSIGNMENT DELIVERABLES AND TECHNICAL DIRECTION:**

The Work Assignment Contracting Officer's Representative (COR) is authorized to issue technical direction under this work assignment. The WAM will follow-up all oral technical direction in writing within 5 days.

### **TASK 2: DOCUMENT REVIEW AND DESIGN METHODOLOGY**

*[Contract Scope of Work Element III, Section 1, para(s) 1, page(s) (10 -11)]*

- 2-1 PARTICIPATE IN A CONFERENCE. The contractor shall participate in a conference call with the EPA COR and other Agency staff to clarify the purpose of the evaluation effort and to exchange ideas about the design of the assessment, the information to be collected, potential sources of information, appropriate ways to analyze and present the information, and other pertinent matters. The COR will contact the contractor and provide a time and date for the conference call. For purposes of costing the contractor shall assume one two-hour conference call.
- 2-2 REVIEW DOCUMENTS. The EPA COR will provide the contractor with essential documents to become familiar with the history, goals, and status of each program activity to be evaluated. In addition, the contractor shall conduct a literature review to determine if any existing evaluations, studies or analysis of the program have been conducted. The contractor shall complete a review of these documents seven (7) calendar days after receiving them. In addition, in order to take advantage of a distilled discussion of many issues germane to this evaluation, the contractor shall review summary transcripts of ongoing discussions/focus groups that have been planned independent of this evaluation in order to gather valuable data of some of the key issues and challenges in hazardous waste determination.
- 2-3 ASSIST IN DEVELOPING A LOGIC MODEL. The development of a logic model is an essential tool in developing a common understanding of a program's inputs, outputs and activities. As an initial step in preparation for the evaluation, EPA began developing a logic model of its program. EPA will share the draft logic model with the contractor.

The contractor shall finalize the logic model using software (e.g., Microsoft Word, Power Point) that can be manipulated/revised by EPA within 7 calendar days after receipt of the draft logic model from the EPA COR. For purposes of costing, the contractor shall assume up to 8 hours of work of team correspondence regarding the logic model and 10 hours of development and revising the model.

- 2-4 **REFINE EVALUATION QUESTIONS.** Using the logic model developed in Task 2-3, the contractor shall meet with the EPA COR and evaluation team members via conference call to refine the evaluation questions that will be the subject of this evaluation. A list of the draft questions will be delivered 7 calendar days after the final meeting to discuss the questions. Final questions will be due 7 calendar days after receipt of comments from the EPA COR via TD. For purposes of costing, the contractors shall assume 2 two-hour conference calls with the program office to refine these evaluation questions.

## **Phase 2**

- 2-5 **DESIGN EVALUATION METHODOLOGY. (COMPLETED)** Based on the conference call in 2-2 and the final logic model, the contractor shall prepare a draft evaluation methodology, which will address the purpose, audience, the refined questions that will be the focus of the evaluation, and information needed to evaluate the program. This methodology shall include a plan for gathering the needed information, including interview/discussion guides for the program evaluation and a plan for compiling, analyzing and presenting the information gathered. The draft evaluation methodology shall also include a proposed schedule for: (1) delivering the information gathering plan (Task 3-1), (2) discussing the compilation, analysis and presentation of information (Task 3-2) and for providing the draft and final reports (Task 4-1 and 4-2). The draft evaluation methodology shall be due 14 calendar days after a receipt of a TD from the EPA COR. The final evaluation methodology will be due 7 calendar days after receipt of comments from the EPA COR via TD.
- 2-6 **QUALITY ASSURANCE PLAN. (COMPLETED)** The contractor shall prepare a quality assurance plan (QAP) that shall describe the use of primary and or secondary data sources for the evaluation report. Specifically, the QAP will describe: 1) the purpose of the evaluation, 2) the methodology used to collect data for the report, 3) how and where data for the evaluation was collected, 4) why the particular data collection method was chosen, 5) how the data will be used and by whom, 6) how the resulting evaluation report will be used and by whom and, 7) any data limitations or caveats. An example of a QAP will be provided by the WAM. The contractor shall submit the QAP to the EPA COR one week after the final evaluation methodology is approved. A final QAP will be delivered 3 calendar days after receipt of comments from the EPA COR via TD.

## **Deliverables and Schedule Under Task 2**

### **Phase 1 of the Project**

2-1a	Participate in conference	To be specified by the EPA WAM
2-1b	Participate in planned meetings with regions	Pending approval of WA
2-2	Review of Documents (no deliverables)	7 calendar days after receipt of documents
2-3	Finalize Logic Model	7 calendar days after receipt of draft Logic Model from EPA WAM
2-4a	Draft Refined Questions	7 calendar days after final meeting with EPA WAM
2-4b	Final Refined Questions	7 calendar days after receipt of comments from EPA WAM via TD

### **Phase 2 of the Project**

2-5a	Draft evaluation methodology	14 calendar days after receipt of TD from EPA WAM
2-5b	Final evaluation methodology	7 calendar days after receipt of comments via TD from EPA WAM
2-6	Quality Assurance Plan	7 calendar days after WAM approves final evaluation methodology
2-6b	Final Quality Assurance Plan	3 calendar days after receipt of comments via TD from EPA WAM

## **TASK 3: INFORMATION GATHERING AND ANALYSIS (ONGOING)**

*[Contract Scope of Work Element III, Section 1, para(s) 1, page(s) (10 -11)]*

- 3-1 INFORMATION GATHERING. The information that is needed to conduct this evaluation will come from a variety of sources. Within 7 calendar days after the EPA WAM approves the evaluation methodology (via TD), the contractor shall begin the data collection process specified in the approved evaluation methodology. For the purposes of costing, the contractor shall assume conducting no more than 18 interviews (2 hours in duration), no more than 5 focus groups (2 hours in duration), exploring the development of a survey that can be administered to federal partners (not constrained by PRA restrictions), and conducting an expert panel that will identify the issues, solutions, and barriers to appropriate hazardous waste determination. The focus groups may include contractor travel to up to three centrally located locations to ensure the highest quality of focus groups data. The contractor shall explore several methodological approaches that will be temporally prioritized and the implementation of each method will be contingent upon what is obtained in the methodology preceding it. The sequential implementation of each methodology will be undertaken with technical direction from the WAM-COR.
- 3-2 DISCUSSION OF DATA COMPILATION, ANALYSIS, AND PRESENTATION. **(COMPLETED)** In accordance with the evaluation methodology schedule, the contractor shall meet via conference call with the EPA COR and other Agency staff to

present approaches to and preliminary results of compilation, analysis, and presentation of the information.

### **Deliverables and Schedule Under Task 3**

3-1a	Begin information collection	Within 7 calendar days after EPA WAM approves final evaluation methodology.
3-1b	Complete information collection	In accordance with the evaluation methodology schedule approved by the EPA WAM in task 2-5b.
3-2	Discuss data compilation, analysis and presentation	In accordance with Methodology Schedule approved in Task 2-5b

### **TASK 4:     REPORTS (INCOMPLETE)**

*[Contract Scope of Work Element III, Section 1, para(s) 1, page(s) (10 -11)]*

- 4-1     DRAFT REPORT. In accordance with the evaluation methodology schedule, the contractor shall submit a draft report containing, the compilation, analysis, and presentation of information developed and gathered during the conduct of the evaluation, specifically, information obtained or developed in support of Tasks 2-1 through 3-2.
- 4-2     FINAL REPORT. The contractor shall provide a final report that reflects appropriate consideration of the Agency's comments on the draft report and of any comments received during the oral presentations. The EPA COR will provide the contractor with a copy of the Evaluation Support Divisions' Report Style Guidelines. These guidelines shall be used to write all components of the evaluation report. In addition, the contractor shall use the ESD Report Cover provided by the EPA COR when preparing the final report.
- 4-3     EVALUATION RECOMMENDATION TAXONOMY FORM. The EPA will use this form to categorize each recommendation the contractor develops for the final report. The contractor shall complete the Evaluation Recommendation Taxonomy Form by providing each recommendation for the given evaluation, its proposed evaluation recommendation category, its direct environmental impact, and any additional comments the contractor may have. The list of the evaluation recommendation categories is located on the form for reference purposes. The EPA COR will provide the contractor with a copy of the Evaluation Recommendation Taxonomy Form.
- 4-4     ORAL PRESENTATIONS. The contractor shall be prepared to make at least one oral presentation of the information at a date, time, and location to be specified by the EPA COR in a TD. The location will most likely be Washington, D.C. The contractor shall prepare appropriate briefing materials, specifically, a power point briefing for the oral presentation.



- 4-5     FACTSHEET. The contractor shall develop a fact sheet summarizing the evaluation purpose, questions, methodology, results and recommendations. The EPA COR will provide the contractor with a copy of a fact sheet template.

**Deliverables and Schedule Under Task 4**

4-1	Draft report	In accordance with the evaluation methodology schedule approved by the WAM in task 2-5b.
4-2	Final report	14 calendar days after receipt of comments on the draft report and oral presentations.
4-3	Evaluation Recommendation Taxonomy	3 calendar days after the final report is completed.
4-4	Oral presentation	To be scheduled by the EPA WAM
4-5	Fact Sheet	7 calendar days after completion of Final Report

<b>Table 1: Summary of Deliverables and Dates</b>		
<b>Task</b>	<b>Deliverable</b>	<b>Due Date</b>
<b>Task 1 Prepare Work plan</b>		
1a	Work plan	Within 15 calendar days of receipt of work assignment
1b	Revised work plan	Within 3 calendar days of receipt of comments from CO
<b>Task 2 Document Review and Design Methodology</b>		
2-1	Participate in conference	To be specified by the EPA WAM
2-2	Review of Documents	7 calendar days after receipt of documents
2-3	Finalize Logic Model	7 calendar days after receipt of draft Logic Model from EPA WAM
2-4a	Draft Refined Questions	7 calendar days after final meeting with EPA WAM
2-4b	Final Refined Questions	7 calendar days after receipt of comments from EPA WAM via TD
2-5a	Draft Methodology	14 calendar days after receipt of TD from EPA WAM
2-5b	Final Methodology	7 calendar days after receipt of comments from EPA WAM
2-6a	Draft Quality Assurance Plan	7 calendar days after EPA WAM approves final evaluation methodology
2-6b	Final Quality Assurance Plan	3 days after receipt of comments from EPA WAM via TD
<b>Task 3 Information Gathering and Analysis</b>		
3-1a	Begin Info. Collection	7 calendar days after EPA WAM approves final evaluation methodology via TD
3-1b	Complete Info. Collection	In accordance with Methodology Schedule approved in Task 2-5b
3-2	Discussion of Data Compilation, Analysis and Presentation Plan	In accordance with Methodology Schedule approved in Task 2-5b
<b>Task 4 Report</b>		
4-1	Draft Report	In accordance with Methodology Schedule approved in Task 2-5b
4-2	Final Report	14 calendar days after receipt of comments on Draft Report from EPA WAM
4-3	Evaluation Recommendation Taxonomy Form	3 calendar days after completion of the Final Report
4-4	Oral Presentations	To be scheduled by the EPA WAM
4-5	Fact Sheet	7 calendar days after completion of Final Report

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 2-15				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-W-10-002			Contract Period 11/19/2009 To 11/18/2014			Title of Work Assignment/SF Site Name				
			Base                      Option Period Number      2			Outc. Eval. Haz Waste Det. Reg				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW Pg. 10-11, Element III, Sec. I, Para 1					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From 11/19/2011 To 06/15/2012					
Comments: The purpose of the this action is to extend WA # 2-15 to June 15, 2012 at no additional cost to the governemnt. The purpose of this extension is to make final revisions, corrections and technical edits to the final deliverable.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations date use EPA Form 1900-69A.										
SFO (Max 2) <input type="checkbox"/>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
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Work Assignment Manager Name Terell Lasane							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number 202-566-0705			
							FAX Number:			
Project Officer Name Cheryl R. Brown							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 202-566-0940			
							FAX Number:			
Other Agency Official Name							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number:			
							FAX Number:			
Contracting Official Name Jami Rodgers							Branch/Mail Code:			
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							FAX Number:			